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July 8, 2023

Docket No.: 52-026

ND-23-0164
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4

ITAAC Closure Notification on Completion of Item 2.6.03.02.i [Index Number 597]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.03.02.i [Index Number 597] to demonstrate that the Class 1E dc and Uninterruptible Power Supply System (IDS) equipment identified as seismic Category I in the Combined License (COL) Appendix C, Table 2.6.3-1 are designed and constructed in accordance with applicable requirements.

The closure process for this ITAAC is based on the guidance described in NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

A handwritten signature in black ink that reads "Jamie Coleman".

Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.03.02.i [Index Number 597]

JMC/AD/sfr

cc: Regional Administrator, Region II
 Director, Office of Nuclear Reactor Regulation (NRR)
 Director, Vogtle Project Office NRR
 Senior Resident Inspector – Vogtle 3 & 4

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Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.6.03.02.i [Index Number 597]

ITAAC Statement

Design Commitment:

2. The seismic Category I equipment identified in Table 2.6.3-1 can withstand seismic design basis loads without loss of safety function.

Inspections, Tests, Analyses:

- i) Inspection will be performed to verify that the seismic Category I equipment identified in Table 2.6.3-1 is located on the Nuclear Island.
- ii) Type tests, analyses, or a combination of type tests and analyses of seismic Category I equipment will be performed.
- iii) Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

Acceptance Criteria:

- i) The seismic Category I equipment identified in Table 2.6.3-1 is located on the Nuclear Island.
- ii) A report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function.
- iii) A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

ITAAC Determination Basis

This ITAAC requires that inspections, tests, and analyses be performed and documented to ensure the Class 1E dc and Uninterruptible Power Supply System (IDS) equipment identified as seismic Category I in the Combined License (COL) Appendix C, Table 2.6.3-1 (the Table) are designed and constructed in accordance with applicable requirements.

i) The seismic Category I equipment identified in Table 2.6.3-1 is located on the Nuclear Island.

To assure that seismic Category I equipment can withstand seismic design basis loads without loss of safety function, all the equipment in the Table is designed to be located on the seismic Category I Nuclear Island. In accordance with Equipment Qualification (EQ) ITAAC As-Built Walkdown Guideline and the EQ ITAAC As-built Installation Documentation Guideline (References 1 and 2), an inspection was conducted of the IDS to confirm the satisfactory installation of the seismically qualified equipment. The inspection included verification of equipment make/model/serial number and verification of equipment location (Building, Elevation, Room). The EQ As-Built Reconciliation Reports (EQRR) (Reference 3) identified in Attachment A documented the results of the inspection and concluded that the seismic Category I equipment is located on the Nuclear Island.

ii) A report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function.

Seismic Category I equipment in the Table require type tests and/or analyses to demonstrate structural integrity and operability. Safety-related (Class 1E) electrical equipment in the Table is seismically qualified by type testing or type testing combined with analysis in accordance with Institute of Electrical and Electronics Engineers (IEEE) Standard 344-1987 (Reference 4). The specific qualification method (i.e., type testing, analysis, or combination) used for each piece of equipment in the Table is identified in Attachment A. Additional information about the methods used to qualify AP1000 safety-related equipment is provided in the Updated Final Safety Analysis Report (UFSAR) Appendix 3D (Reference 5). The EQ Reports (Reference 6) identified in Attachment A contain applicable test reports and associated documentation and concluded that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function.

iii) A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

An inspection (References 1 and 2) was conducted to confirm the satisfactory installation of the seismically qualified equipment in the Table. The inspection verified the equipment make/model/serial number, as-designed equipment mounting orientation, anchorage and clearances, and electrical and other interfaces. The documentation of installed configuration of seismically qualified equipment included photographs and/or sketches/drawings of equipment/mounting/interfaces.

As part of the seismic qualification program, consideration is given to the definition of the clearances needed around the equipment mounted in the plant to permit the equipment to move during a postulated seismic event without causing impact between adjacent pieces of safety-related equipment. When required, seismic testing by measuring the maximum dynamic relative displacement of the top and bottom of the equipment was performed. EQ Reports (Reference 6) identified the equipment mounting employed for qualification and established interface requirements for assuring that subsequent in-plant installation does not degrade the established qualification. Interface requirements are defined based on the test configuration and other design requirements.

Attachment A identifies the EQRR (Reference 3) completed to verify that the as-built seismic Category I equipment listed in the Table, including anchorage, are seismically bounded by the tested or analyzed conditions, IEEE Standard 344-1987 (Reference 4) and NRC Regulatory Guide (RG) 1.100 (Reference 7).

Together, these reports (References 3 and 6) provide evidence that the ITAAC Acceptance Criteria requirements are met:

- The seismic Category I equipment identified in Table 2.6.3-1 is located on the Nuclear Island;
- A report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function; and

- A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

References 3 and 6 are available for NRC inspection as part of the Unit 4 ITAAC 2.6.03.02.i Completion Packages (References 8).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This finding review, (which included now-consolidated ITAAC Indexes 598 and 599), found no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.03.02.i (Reference 8) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.03.02.i was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. ND-RA-001-014, EQ ITAAC As-Built Walkdown Guideline, Version 3.1
2. ND-RA-001-016, EQ ITAAC As-built Installation Documentation Guideline, Version 1.0
3. As-Built EQ Reconciliation Reports (EQRR) as identified in Attachment A
4. IEEE Standard 344-1987, "IEEE Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
5. Vogtle 3&4 Updated Final Safety Analysis Report Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment"
6. Equipment Qualification (EQ) Reports as identified in Attachment A
7. Regulatory Guide 1.100, Rev. 2, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants"
8. 2.6.03.02.i-U4-CP-Rev0, "Completion Package for Unit 4 ITAAC 2.6.03.02.i [Index Number 597]"

Attachment A

System: Class 1E dc and Uninterruptible Power Supply System (IDS)

Equipment Name +	Tag No. +	Seismic Cat. I +	Type of Qual.	EQ Reports (Reference 6)	As-Built EQRR (Reference 3)
Division A 250 Vdc 24-Hour Battery Bank	IDSA-DB-1	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division B 250 Vdc 24-Hour Battery Bank 1	IDSB-DB-1	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division B 250 Vdc 72-Hour Battery Bank 2	IDSB-DB-2	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division C 250 Vdc 24-Hour Battery Bank 1	IDSC-DB-1	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division C 250 Vdc 72-Hour Battery Bank 2	IDSC-DB-2	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division D 250 Vdc 24-Hour Battery Bank	IDSD-DB-1	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Spare 250 Vdc Battery Bank	IDSS-DB-1	Yes	Type Test & Analysis	SV4-DB01-VBR-002 / SV4-DB01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division A 24-Hour Battery Charger 1	IDSA-DC-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division B 24-Hour Battery Charger 1	IDSB-DC-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division B 72-Hour Battery Charger 2	IDSB-DC-2	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division C 24-Hour Battery Charger 1	IDSC-DC-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division C 72-Hour Battery Charger 2	IDSC-DC-2	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division D 24-Hour Battery Charger 1	IDSD-DC-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Spare Battery Charger 1	IDSS-DC-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division A 250 Vdc Distribution Panel	IDSA-DD-1	Yes	Type Test & Analysis	SV4-DD01-VBR-002 / SV4-DD01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division B 250 Vdc Distribution Panel	IDSB-DD-1	Yes	Type Test & Analysis	SV4-DD01-VBR-002 / SV4-DD01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division C 250 Vdc Distribution Panel	IDSC-DD-1	Yes	Type Test & Analysis	SV4-DD01-VBR-002 / SV4-DD01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division D 250 Vdc Distribution Panel	IDSD-DD-1	Yes	Type Test & Analysis	SV4-DD01-VBR-002 / SV4-DD01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division A 120 Vac Distribution Panel 1	IDSA-EA-1	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division A 120 Vac Distribution Panel 2	IDSA-EA-2	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division B 120 Vac Distribution Panel 1	IDSB-EA-1	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division B 120 Vac Distribution Panel 2	IDSB-EA-2	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002

Equipment Name *	Tag No. *	Seismic Cat. I *	Type of Qual.	EQ Reports (Reference 6)	As-Built EQRR (Reference 3)
Division B 120 Vac Distribution Panel 3	IDSB-EA-3	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division C 120 Vac Distribution Panel 1	IDSC-EA-1	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division C 120 Vac Distribution Panel 2	IDSC-EA-2	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division C 120 Vac Distribution Panel 3	IDSC-EA-3	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division D 120 Vac Distribution Panel 1	IDSD-EA-1	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division D 120 Vac Distribution Panel 2	IDSD-EA-2	Yes	Type Test	SV4-EA01-VBR-004 / SV4-EA01-VBR-003	2.6.03.02.i-U4-EQRR-PCD002
Division A Fuse Panel 4	IDSA-EA-4	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSA Battery Monitor Fuse Panel	IDSA-EA-5	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division B Fuse Panel 4	IDSB-EA-4	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division B Fuse Panel 5	IDSB-EA-5	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division B Fuse Panel 6	IDSB-EA-6	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSB Battery Monitor Fuse Panel	IDSB-EA-7	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSB Battery Monitor Fuse Panel	IDSB-EA-8	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division C Fuse Panel 4	IDSC-EA-4	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division C Fuse Panel 5	IDSC-EA-5	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division C Fuse Panel 6	IDSC-EA-6	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSC Battery Monitor Fuse Panel	IDSC-EA-7	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSC Battery Monitor Fuse Panel	IDSC-EA-8	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division D Fuse Panel 4	IDSD-EA-4	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSD Battery Monitor Fuse Panel	IDSD-EA-5	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
IDSS Battery Monitor Fuse Panel	IDSS-EA-1	Yes	Type Test & Analysis	SV4-EA03-VBR-003 / SV4-EA03-VBR-004	2.6.03.02.i-U4-EQRR-PCD002
Division A Fused Transfer Switch Box 1	IDSA-DF-1	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division B Fused Transfer Switch Box 1	IDSB-DF-1	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001

Equipment Name *	Tag No. *	Seismic Cat. I *	Type of Qual.	EQ Reports (Reference 6)	As-Built EQRR (Reference 3)
Division B Fused Transfer Switch Box 2	IDSB-DF-2	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division C Fused Transfer Switch Box 1	IDSC-DF-1	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division C Fused Transfer Switch Box 2	IDSC-DF-2	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division D Fused Transfer Switch Box 1	IDSD-DF-1	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Spare Fused Transfer Switch Box 1	IDSS-DF-1	Yes	Type Test & Analysis	SV4-DF01-VBR-002 / SV4-DF01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division A 250 Vdc MCC	IDSA-DK-1	Yes	Type Test & Analysis	SV4-DK01-VBR-002 / SV4-DK01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division B 250 Vdc MCC	IDSB-DK-1	Yes	Type Test & Analysis	SV4-DK01-VBR-002 / SV4-DK01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division C 250 Vdc MCC	IDSC-DK-1	Yes	Type Test & Analysis	SV4-DK01-VBR-002 / SV4-DK01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division D 250 Vdc MCC	IDSD-DK-1	Yes	Type Test & Analysis	SV4-DK01-VBR-002 / SV4-DK01-VBR-001	2.6.03.02.i-U4-EQRR-PCD003
Division A 250 Vdc Switchboard 1	IDSA-DS-1	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division B 250 Vdc Switchboard 1	IDSB-DS-1	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division B 250 Vdc Switchboard 2	IDSB-DS-2	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division C 250 Vdc Switchboard 1	IDSC-DS-1	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division C 250 Vdc Switchboard 2	IDSC-DS-2	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division D 250 Vdc Switchboard 1	IDSD-DS-1	Yes	Type Test & Analysis	SV4-DS01-VBR-002 / SV4-DS01-VBR-001	2.6.03.02.i-U4-EQRR-PCD001
Division A Regulating Transformer	IDSA-DT-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division B Regulating Transformer	IDSB-DT-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division C Regulating Transformer	IDSC-DT-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division D Regulating Transformer	IDSD-DT-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division A 24-Hour Inverter 1	IDSA-DU-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division B 24-Hour Inverter 1	IDSB-DU-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division B 72-Hour Inverter 2	IDSB-DU-2	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division C 24-Hour Inverter 1	IDSC-DU-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003

Equipment Name +	Tag No. +	Seismic Cat. I +	Type of Qual.	EQ Reports (Reference 6)	As-Built EQRR (Reference 3)
Division C 72-Hour Inverter 2	IDSC-DU-2	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Division D 24-Hour Inverter 1	IDSD-DU-1	Yes	Type Test	SV4-IDS-VBR-001 / SV4-IDS-VBR-002	2.6.03.02.i-U4-EQRR-PCD003
Spare Battery Termination Box	IDSS-DF-3	Yes	Type Test & Analysis	SV4-DF03-VBR-003 / SV4-DF03-VBR-001	2.6.03.02.i-U4-EQRR-PCD001

Notes:

+ Excerpt from COL Appendix C Table 2.6.3-1